

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

The Icon at Panorama, LLC,

Plaintiff,

v.

Southwest Regional Council of Carpenters,
et al.

Defendants.

Case No. 2:19-cv-00181-CBM-MRW

**JOINT STIPULATION CONCERNING
EXPERT DISCLOSURES**

Pursuant to Local Rule 7-1, Plaintiff The Icon at Panorama, LLC and Defendants Southwest Regional Council of Carpenters; Laborers International Union of North America Local 300; Daniel Langford; Alexis Olbrei; Ron Diamant; Pete Rodriguez; Ernesto Pantoja; Sergio Rascon; Angel Olvera; SWAPE, LLC; and Smith Engineering & Management (the “Parties”) jointly stipulate to the following additional schedule for the exchange of expert disclosures:

1. No later than **October 27, 2023**, Plaintiff shall disclose to Defendants the identities of all expected expert witnesses, their CVs, and the subject matter of their expected testimony.

2. No later than **November 10, 2023**, Defendants shall disclose to Plaintiff the identities of all expected expert witnesses, their CVs, and the subject matter of their expected testimony. Defendants shall indicate whether any expert witness is designated as a rebuttal witness only.

3. No later than **November 22, 2023**, and only if necessary in response to Defendants’ disclosures as set forth in the preceding paragraph, Plaintiff shall disclose to Defendants the identities and CVs of all expected rebuttal expert witnesses. For each witness disclosed pursuant to this paragraph, Plaintiff shall identify the subject matter of the witness’s expected testimony from

1 among the subject matter of expected expert testimony disclosed by Defendants pursuant to the
2 preceding paragraph.

3 4. All case management deadlines, as set forth in the Court's Order to Re-Set Case
4 Management Dates, dated March 6, 2023, *see* ECF No. 264, shall remain unchanged.

5 5. The Parties have conferred and agreed that the additional schedule set forth above
6 will expedite discovery and promote an efficient disposition of the litigation.

7 6. Pursuant to L.R. 7-1 and L.R. 52-4.1, a proposed order is separately submitted with
8 this Joint Stipulation.
9

10
11 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.
12

13 Date: August 1, 2023

MORRISON & FOERSTER LLP

14
15 
16

17 _____
18 Whitney O'Byrne
19 Alex Okuliar
20 Christopher Adler
21 Matthew Ladew

Attorneys for Plaintiff The Icon at Panorama, LLC

22 REICH, ADELL & CVITAN, A PLC

23 
24

25 Laurence S. Zakson
26 Alexander B. Cvitan
27 William Y. Sheh
28 Aaron G. Lawrence

Attorneys for Defendants Laborers International
Union of North America Local 300, Ernesto Pantoja,

1 Sergio Rascon, Angel Olvera, and Smith Engineering
2 and Management

3 TYSON & MENDES, LLP

4 

5
6 Mitchell B. Malachowski
7 Kristi Blackwell
8 Sam Camp

9 Attorneys for Defendant SWAPE, LLC

10 SHANLEY APC

11
12 

13
14 Daniel M. Shanley
15 Desmond C. Lee
16 Giovanni Chavez

17 WILLIAMS & CONNOLLY LLP

18 

19
20
21 Edward Reddington
22 Benjamin Greenblum
23 Emily Rose
24 William D. Ferraro
25 Danielle Barondess

26 Attorneys for Defendants Southwest Regional
27 Council of Carpenters, Daniel Langford, Alexis
28 Olbrei, Ron Diamant, and Pete Rodriguez